

(Rev. 5/05)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

(1) Paul Romano 172653
(Name of Plaintiff) (Inmate Number)

(Complete Address with zip code)

(2) N/A
(Name of Plaintiff) (Inmate Number)

(Complete Address with zip code)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

vs.

(1) Mr. Stan Taylor / Commissioner of Corrections
(2) Mr. Vince Brance / Warden, Central Violation Center
(3) Mr. James Hutchins / Deputy Warden, Central Violation Ctr.
(Names of Defendants)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

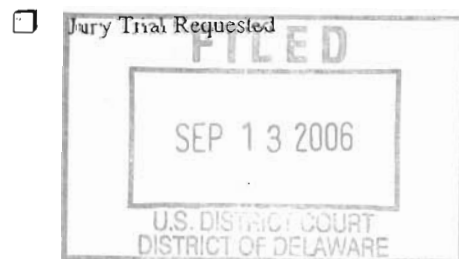
NONE

06-573

(Case Number)
(to be assigned by U.S. District Court)

Scanned-30 9/13/06

CIVIL COMPLAINT



II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes ☐ No
- C. If your answer to "B" is Yes:

1. What steps did you take? Spoke to Counselor Washington, Tolan, Supervisor R. Gilbert Counselor Ms. Williams of P&P, Counselor Hicks.
2. What was the result? Was continually passed from one to the other with no answer, just disrespect and blatant unprofessionalism

- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS (in order listed on the caption)

- (1) Name of first defendant: Mr. Stanley Taylor
Employed as Commissioner at Department of Correction, Delaware
Mailing address with zip code: 245 McKee Drive, Dover, DE 19901

- (2) Name of second defendant: Mr. Vincent Bianco
Employed as Warden at Central Violation Center
Mailing address with zip code: 875 Smyrna Landing Rd., Smyrna DE 19977

- (3) Name of third defendant: Mr. James Hutchins
Employed as Deputy Warden at Central Violation Center
Mailing address with zip code: 875 Smyrna Landing Rd. Smyrna DE 19977
(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1.

SEE ATTACHED Exhibits A, B, C

2.

3.

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1.

The first part of my request is for the state to reimburse me for lost wages totaling \$1,000⁰⁰ a weeks worth. As well as monetary reimbursement for my lost personal belongs totaling approximately \$14,700⁰⁰ (see attached exhibit of approximate loses. Exhibit D)

2. The (2nd) second request is to be returned to Level III for (60 days). This would allow me to attempt to regain my lost possessions and any other articles and legal documents.
3. The (3rd) third request is to have the entire case remanded back to Superior Court Judge: Honorable Richard R. Cooch / New Castle County Superior Court. This would allow me the opportunity to explain everything and request modification or other legal relief

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31 day of August, 2006.

Paul F. Romano
(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)

Names of Defendant Cont.

Mr. Robert George

Mr. William Edel

Ms. Tolson

Ms. Williams

Mr. Reggie Gilbert

Mr. Washington

Mr. Hicks

Ms. Laura Sikora

Mr. Micheal Records

Ms. May

Mr. Alan Grinstead

Mr. Carl Danberg

III.

Additional Defendants

Name of fourth Defendant: Mr. Robert George

Employed as: Warden at: Sussex Community Corrections Center

Mailing address: Rt. 6 Box 700, Georgetown, DE 19947

Name of Fifth Defendant: Mr. William Edel

Employed as: Deputy Warden at: Sussex Community Corrections Center

Mailing address: Rt. 6 Box 700, Georgetown, DE 19947

Name of sixth Defendant: Mr. Vincent Bianco

Employed as: Warden at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Seventh Defendant: Mr. James Hutchins

Employed as: Deputy Warden at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Eighth Defendant: Ms. Tolson

Employed as: Counselor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Ninth Defendant: Ms. Williams

Employed as: Probation & Parole Counselor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Tenth Defendant: Mr. Reggie Gilbert

Employed as: Clinical Supervisor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

III.

Additional Defendants

Name of Eleventh Defendant: Mr. Washington

Employed as: Counselor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Twelfth Defendant: Mrs. Hicks

Employed as: Senior Counselor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Thirteenth Defendant: Ms. Laura Sikora

Employed as: Shift Commander at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Fourteenth Defendant: Mr. Micheal Records

Employed as: Probation & Parole Supervisor at Central Violation Center

Mailing Address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of Fifteenth Defendant: Mr. May

Employed as: Staff Lieutenant at Central Violation Center

Mailing address: 875 Smyrna Landing Rd., Smyrna, DE 19977

Name of sixteenth Defendant: Mr. Alan Grinstead

Employed as: Probation & Parole Director at Department of Correction

Mailing address: 511 Maple Parkway, Dover, DE 19901

Name of seventeenth Defendant: Mr. Carl Danberg

Employed as: Attorney General at State of Delaware

Mailing address: 820 North French St., 8th flr Carvel Office Bldg.

Wilmington, DE. 19801

SCC
 Paul Romano
 #1 #00172653
 3207 Dupont Blvd.
 Georgetown, DE 19947



Clerk
 U.S. District Court
 Lock Box 18
 44 N. King St.
 Wilmington, DE 19801



F-1- 8/13

ON 4/13/06 I WAS sentenced to II yrs Level V
suspended After 14 days.

Release to Level III Hold for Bed space Level III
Crest upon successful completion Crest 18 months level III Aftercare.

ON 4/13/06 I was not Released and Held At Slop over Easter week End.

ON 4/17/06 I wrote Records department advising them I was Being
Held, In violation of court order, with no Reply Back.

ON 4/18/06 I Advised the records department A 2nd time, I was Being
Held, In violation of court order, with no Reply Back.

ON 4/19/06 I was sent to CROP. where they tried to enter me I
civigenits the same day But could'nt It was to late I The day
and Bed space was Already taken so I was Put on a sanction
Pod #1 overnight then put Back over In Pod #7 civigenits
The next day! 4/20/06

I sat In civigenits for 2 days Before I Received a
name Tag, Books & Talked to a counselor Mr. Washington
I Asked Him If He could Help me get me a copy of my sentencing
order, He said He would see what He could do! then Had me
sign In to civigenits, never got Back to me!

ON 4/23/06 I Presented the same question to Ms. Tolson she Also said
she would see what she could do, no Reply Back!

ON 4/26/06 I Asked Counselor Washington about my sentencing order,
He gave me a copy of my sentencing work sheet which was
Partially covered up with a status sheet showing the end of my Level V
Time and Release date And no further Info on sentence.

In addition added A second sentence order for Level IV Crest

At this time My counselor said He would Abuse His supervisor
Mr. Reggie Gilbert on this matter! No Response!

1-2 8/13

On 7/30 My counselor Mr. Washington scheduled me an appointment with Probation & Parole counselor Mrs. Williams,

which told me my Level III sentence was Reversed Not True! My Level II Probation was Reversed.

She then looked at my sentencing order in the computer where I saw Release to Level III, when I pointed it out to her she hurried up & changed the screen and told me "That is water under the Bridge now" "Her exact words"!

I knew I was stuck so I just attended citizens for 12 weeks to await Crest Level IV Plummer center, which had, and still has a lengthy waiting list! Further extending my sentence!

On 6/13 I passed last test for the streets when I was sanctioned for a Basic Rules Infraction by another inmate, for indirect disrespect towards a counselor after she disrespected me!

st On 6/14 I received accountability by counselor Ms. Nazario
I received Public Apology; 2 hrs community service, 1 week growth morning & evening meetings!

and On 6/16 my write up went to Rang. Peer accountability Group
In front of counselor disrespected. the whole incident was to be squashed with my First Accountability 6/14

On 6/16 I received Feedback on my writeup from whole class Panel #9
Where I was disrespected and called names for 45 minutes the whole class participated. Where at the end of class counselor Hicks told me "I wasn't anything, that she got's home at night & drives a Ford Explorer with 20" inch rims what does that have to do with my Peer accountability Group I don't know!"

That same time after meeting let out counselor Reggie called for me, asked me if what I said was true I implied "yes" He then told me to check my "Fucking Shit" things!

13 8/13

3rd

Placed In Pod #1 The hole, My third Accountability on 5/23 M.D.T. Board met and sanctioned me to 2 weeks on a Memo, not a write up from D.O.C. for Disrespect towards a counselor a third Accountability for a Basic Rule Infraction. Where I was In a Therapeutic Community for such Actions.

I spent 2 weeks on Pod #1 the hole!

4th

Sent to Slop a forth accountability 14 days ended up being 24 days then returned to Pod #2 where I waited another 2 weeks to re-enter Civigenits where I left off. a total of 53 days out of Program.

On 8/9 I went back to Civigenits and signed out and went Infront of M.D.T. where they said I could wait 60 days in Civigenits Before my name goes on list to Planner center or 60 days sanction for signing out Slop.

My Reply was that I would Grievance them for failure to do-Process for I was In contempt of my court order.

M.T.D. said that was not an option 60 days Slop

This is an Attempt to see my Judge so I can Bring Forth These Issues.

During My Hold Time which should Have Been Level III I lost my Home and All My Personal Belongings due to this illegal hold. Had I Been Released As ordered by the court. I could Have Placed my things In storage and worked out arrangements with my Land Lord and co-workers/partners As It is now, I am not only homeless but completely destitute thanks to Dept. of corr. failure to follow simple court order.

Exhibit D

<u>Item</u>	<u>Condition</u>	<u>est. Cost</u>
Refrigerator	New	\$ 2000. ⁰⁰
Microwave	New	\$ 300. ⁰⁰
Oven	New	\$ 800. ⁰⁰
Washer	New	\$ 900. ⁰⁰
Dryer	New	\$ 900. ⁰⁰
Television	New	\$ 800. ⁰⁰
Vacuum Cleaner	New	400. ⁰⁰
Sofa	New	1500. ⁰⁰
Love Seat	New	600. ⁰⁰
Bedroom Set/Queen Size	New	1200. ⁰⁰
Window Air Conditioners	New	1450. ⁰⁰
Carpet Shampooer	New	1000. ⁰⁰
Kitchen Ware, Cook Ware, Dinner Ware	New	550. ⁰⁰
Clothing	New	1000. ⁰⁰
Security deposit for Rent	New	1500. ⁰⁰